

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,**

Plaintiff,

V.

ZTE CORPORATION

Defendant.



C.A. NO. 6:20-cv-00487-ADA

C.A. NO. 6:20-cv-00488-ADA

C.A. NO. 6:20-cv-00489-ADA

C.A. NO. 6:20-cv-00490-ADA

C.A. NO. 6:20-cv-00491-ADA

C.A. NO. 6:20-cv-00492-ADA

C.A. NO. 6:20-cv-00493-ADA

C.A. NO. 6:20-cv-00494-ADA

C.A. NO. 6:20-cv-00495-ADA

C.A. NO. 6:20-cv-00496-ADA

C.A. NO. 6:20-cv-00497-ADA

ZTE CORPORATION'S NOTICE OF INSTITUTION OF *INTER PARTES* REVIEW
AND GRANT OF *EX PARTE* REEXAMINATION
REGARDING ALL 11 OF THE ASSERTED PATENTS

Defendant ZTE Corporation (“ZTE”) respectfully notifies the Court that, as of August 4, 2022, all 11 of the asserted patents in the 11 cases, as filed against ZTE by WSOU Investments LLC d/b/a Brazos Licensing and Development (“WSOU”), are currently undergoing review, by the Patent Trial and Appeal Board (“PTAB”) and/or the United States Patent and Trademark Office (“USPTO”).

For four of the 11 patents, the PTAB instituted *inter partes* review for U.S. Patent Nos. 7,742,534 (“the ’534 patent”); 7,203,505 (“the ’505 patent”); 8,179,960 (“the ’960 patent”); and 8,147,071 (“the ’071 patent”). In addition, ZTE has also filed a request for *ex parte* reexamination on all claims of the ’505 patent and the ’534 patent, and those reexamination proceedings are pending.

For the other seven of the 11 patents, the USPTO has also granted *ex parte* reexaminations on all claims of U.S. Patent Nos. 7,487,240 (“the ’240 patent”); 8,451,839 (“the ’839 patent”);

8,730,905 (“the ’905 patent”); 9,185,036 (“the ’036 patent”); 9,258,232 (“the ’232 patent”); 9,294,060 (“the ’060 patent”); and 7,489,929 (“the ’929 patent”). All of these reexaminations are still pending.

A chart detailing the status of each patent is below.

Asserted Patent	Status	Case No./Re-examination Application No.
7,742,534	<i>Inter partes</i> review instituted on all claims by the PTAB	IPR2021-00699
	Request for <i>ex parte</i> reexamination on all claims filed August 4, 2022	N/A
7,203,505	<i>Inter partes</i> review instituted on all claims by the PTAB	IPR2021-00698
	Request for <i>ex parte</i> reexamination on all claims filed July 29, 2022	N/A
8,179,960	<i>Inter partes</i> review instituted on all claims by the PTAB	IPR2021-00696
8,147,071	<i>Inter partes</i> review instituted on all claims by the PTAB	IPR2021-00695

7,487,240	<i>Ex parte</i> reexamination granted on all claims by the USPTO on June 28, 2022	90/019,083
8,451,839	<i>Ex parte</i> reexamination granted on all claims by the USPTO on June 28, 2022	90/019,078
8,730,905	<i>Ex parte</i> reexamination granted on all claims by the USPTO on July 13, 2022	90/019,077
9,185,036	<i>Ex parte</i> reexamination granted on all claims by the USPTO on July 1, 2022	90/019,086
9,258,232	<i>Ex parte</i> reexamination granted on all claims by the USPTO on July 29, 2022	90/019,094
9,294,060	<i>Ex parte</i> reexamination granted on all claims by the USPTO on July 12, 2022	90/015,031
7,489,929	<i>Ex parte</i> reexamination granted on all claims by the USPTO on June 24, 2022	90/015,029

Now that all 11 of the asserted patents in the eleven cases are subject to review by the USPTO, ZTE plans to submit a forthcoming motion to stay, pending the outcome of these USPTO proceedings.

Date: August 10, 2022

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on August 10, 2022.

/s/Lionel M. Lavenue

Lionel M. Lavenue